

EXHIBIT 29

SHOOK, HARDY & BACON LLP

B. Trent Webb, Esq. (*pro hac vice*)

Eric Buresh, Esq. (*pro hac vice*)

2555 Grand Boulevard

Kansas City, Missouri 64108-2613

Telephone: (816) 474-6550

Facsimile: (816) 421-5547

bwebb@shb.com

eburesh@shb.com

Robert H. Reckers, Esq. (*pro hac vice*)

600 Travis Street, Suite 1600

Houston, Texas 77002

Telephone: (713) 227-8008

Facsimile: (731) 227-9508

rreckers@shb.com

LEWIS AND ROCA LLP

W. West Allen (Nevada Bar No. 5566)

3993 Howard Hughes Parkway, Suite 600

Las Vegas, Nevada 89169

Tel: (702) 949-8200

Fax: (702) 949-8398

WAllen@LRLaw.com

GREENBERG TRAURIG

Mark G. Tratos, Esq. (Nevada Bar No. 1086)

Brandon Roos, Esq. (Nevada Bar No. 7888)

Leslie Godfrey, Esq. (Nevada Bar No. 10229)

3773 Howard Hughes Parkway

Suite 400 North

Las Vegas, NV 89169

Telephone: (702) 792-3773

Facsimile: (702) 792-9002

tratosm@gtlaw.com

roosb@gtlaw.com

godfrey1@gtlaw.com

Attorneys for Defendants

RIMINI STREET, INC. and SETH RAVIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANT RIMINI STREET INC.'S
SECOND SUPPLEMENTAL
RESPONSES TO PLAINTIFFS'
INTERROGATORIES NOS. 24 AND 25**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Rimini Street, Inc. ("Rimini Street") provides the following responses to Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.'s ("Oracle" or "Plaintiff") Fifth Set of Interrogatories.

1 **GENERAL OBJECTIONS**

2 Rimini Street incorporates its prior General and Specific Objections, stated in Rimini
3 Street's Objections and Responses to Plaintiffs' First Set of Interrogatories, which were served on
4 June 1, 2010, and in Rimini Streets Objections and Responses to Plaintiffs' Fifth Set of
5 Interrogatories, which were served on July 11, 2011.

6
7 **RESPONSES AND SPECIFIC OBJECTIONS**

8 **INTERROGATORY NO. 24:**

9 Identify every copy of any Software and Support Material that is or has at any time been
10 stored at each Non-Customer Location, and the Non-Customer location where it was stored. If any
11 Non-Customer Locations have existed for which you cannot identify any particular Software and
12 Support Material stored at that location, Identify each such Non-Customer Location.

13 **ORIGINAL ANSWER (July 11, 2011):**

14 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome to the
15 extent it seeks information for "any" materials that "is or has at any time" stored in the various
16 identified locations. Rimini Street objects to this interrogatory to the extent it seeks information that
17 is not within the possession, custody, or control of Rimini Street. Rimini Street objects to the term
18 "Non-Customer Location," and Oracle's definition of this term, as vague, ambiguous, overbroad and
19 unduly burdensome. Accordingly, and without conceding that Oracle's Specified Locations meet
20 Oracle's definition of Non-Customer Locations, Rimini will provide an answer for the Oracle
21 Specified Locations. Rimini Street further objects to this interrogatory on the grounds that it would
22 require Rimini Street to create a compilation, abstract, or summary from documents that Rimini
23 Street has produced or will produce to Plaintiffs.

24 Subject to and without waiver of the foregoing general and specific objections, Rimini Street
25 responds as follows:

1 Rimini responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has
 2 produced and/or will produce documents from which the answer to this Interrogatory can be
 3 ascertained, including but not limited to the following:

4 Exhibit 3, which lists Bates-numbers for documents regarding the Oracle Specified
 5 Locations. More specifically, the documents identified by Exhibit 3 indicate the contents of the
 6 Oracle Specified Locations, as well as use of such information.

7 **FIRST SUPPLEMENTAL ANSWER (September 8, 2011):**

8 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome to the
 9 extent it seeks information for “any” materials that “is or has at any time” stored in the various
 10 identified locations. Rimini Street objects to this interrogatory to the extent it seeks information that
 11 is not within the possession, custody, or control of Rimini Street. Rimini Street objects to the term
 12 “Non-Customer Location,” and Oracle’s definition of this term, as vague, ambiguous, overbroad and
 13 unduly burdensome. Accordingly, and without conceding that Oracle’s Specified Locations meet
 14 Oracle’s definition of Non-Customer Locations, Rimini will provide an answer for the Oracle
 15 Specified Locations. Rimini will further provide an answer with respect to network and local
 16 computer locations that, at any time, were intended for use, or were regularly used as, repositories of
 17 Oracle Software and Support Materials that are not associated with a specific customer. Rimini
 18 Street further objects to this interrogatory on the grounds that it would require Rimini Street to create
 19 a compilation, abstract, or summary from documents that Rimini Street has produced or will produce
 20 to Plaintiffs.

21 Subject to and without waiver of the foregoing general and specific objections, Rimini Street
 22 further responds as follows:

23 Rimini identifies the following as locations that currently or at one time included Oracle
 24 Software and Support Materials:

25 \\rsi-clsvr01\client_software\PeopleSoft;

26 \\rsi-clsvr01\internal_software;

27 \\rsi-data01\share\client_archives_ftp.peoplesoft.com;

1 \\rsi-data01\share\software\oracle;
2 \\rsi-data01\share\software\PeopleSoft;
3 \\rsi-clsvr01\fileshare\software\Peoplesoft;
4 \\rsi-clsvr01\client_software\For Development Use Only; and
5 \\rsi-clsvr03\d01\install.

6 The location \\rsi-clsvr01\client_software\PeopleSoft has included materials relating to
7 PeopleSoft software. In the past, certain materials at this location may have been used in building
8 environments for a particular client after Rimini verified that the particular client was entitled to
9 these certain materials.

10 The location \\rsi-clsvr01\internal_software was a parent directory with subdirectories that
11 have included installation materials relating to PeopleSoft software and Oracle Database software. In
12 the past, certain materials at this location may have been used in building environments for a
13 particular client after Rimini verified that the particular client was entitled to these certain materials.

14 The location \\rsi-clsvr03\d01\install has included Software and Support Materials. In the
15 past, certain materials at this location may have been used in building environments for a particular
16 client after Rimini verified that the particular client was entitled to these certain materials.

17 The location \\rsi-data01\share\client_archives_ftp.peoplesoft.com has included materials
18 obtained from PeopleSoft's FTP website. This location was, at one time, intended to be used as a
19 repository for materials for clients that had the right to access such materials through PeopleSoft's
20 FTP site.

21 The location \\rsi-data01\share\software\oracle has included materials relating to Oracle
22 Database software.

23 The location \\rsi-data01\share\software\PeopleSoft has included materials relating to
24 PeopleSoft software.

25 The location \\rsi-clsvr01\client_software\For Development Use Only has included materials
26 relating to Oracle Software and Support Materials. Oracle has had access to this location via VPN
27 for some time.

1 The address \\rsi-clsvr01\fileshare\software\Peoplesoft provides a link to \\rsi-
2 clsvr01\client_software\PeopleSoft, which may include Software and Support materials and
3 described above. Additionally, the address 10.12.1.5 is the IP Address for \\rsi-clsvr01, which may
4 include Software and Support materials as described above. Rimini further responds that, pursuant to
5 Federal Rule of Civil Procedure 33(d), Rimini has produced and/or will produce documents from
6 which the answer to this Interrogatory can be ascertained, including but not limited to the following:

7 Exhibit 3-1, which lists Bates-numbers for documents regarding the Oracle Specified
8 Locations. More specifically, the documents identified by Exhibit 3-1 indicate the contents of the
9 Oracle Specified Locations, as well as use of such information.

10 The documents spanning Bates-range RSI02971994-2158, which are Build Requests that
11 may indicate the sources for environment builds.

12 **SECOND SUPPLEMENTAL ANSWER (November 22, 2011):**

13 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome to the
14 extent it seeks information for “any” materials that “is or has at any time” stored in the various
15 identified locations. Rimini Street objects to this interrogatory to the extent it seeks information that
16 is not within the possession, custody, or control of Rimini Street. Rimini Street objects to the term
17 “Non-Customer Location,” and Oracle’s definition of this term, as vague, ambiguous, overbroad and
18 unduly burdensome. Accordingly, and without conceding that Oracle’s Specified Locations meet
19 Oracle’s definition of Non-Customer Locations, Rimini will provide an answer for the Oracle
20 Specified Locations. Rimini will further provide an answer with respect to network and local
21 computer locations that, at any time, were intended for use, or were regularly used as, repositories of
22 Oracle Software and Support Materials that are not associated with a specific customer. Rimini
23 Street further objects to this interrogatory on the grounds that it would require Rimini Street to create
24 a compilation, abstract, or summary from documents that Rimini Street has produced or will produce
25 to Plaintiffs.

26 Subject to and without waiver of the foregoing general and specific objections, Rimini Street
27 further responds as follows:

1 Rimini identifies the following as locations that currently or at one time included Oracle
2 Software and Support Materials:

3 \\rsi-clsvr01\client_software\PeopleSoft;
4 \\rsi-clsvr01\internal_software;
5 \\rsi-data01\share\client_archives_ftp.peoplesoft.com;
6 \\rsi-data01\share\software\oracle;
7 \\rsi-data01\share\software\PeopleSoft;
8 \\rsi-clsvr01\fileshare\software\Peoplesoft;
9 \\rsi-clsvr01\client_software\For Development Use Only; and
10 \\rsi-clsvr03\d01\install.

11 The location \\rsi-clsvr01\client_software\PeopleSoft has included materials relating to
12 PeopleSoft software. In the past, certain materials at this location may have been used in building
13 environments for a particular client after Rimini verified that the particular client was entitled to
14 these certain materials.

15 The location \\rsi-clsvr01\internal_software was a parent directory with subdirectories that
16 have included installation materials relating to PeopleSoft software and Oracle Database software. In
17 the past, certain materials at this location may have been used in building environments for a
18 particular client after Rimini verified that the particular client was entitled to these certain materials.

19 The location \\rsi-clsvr03\d01\install has included Software and Support Materials. In the
20 past, certain materials at this location may have been used in building environments for a particular
21 client after Rimini verified that the particular client was entitled to these certain materials.

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23 obtained from PeopleSoft's FTP website. This location was, at one time, intended to be used as a
24 repository for materials for clients that had the right to access such materials through PeopleSoft's
25 FTP site.

26 The location \\rsi-data01\share\software\oracle has included materials relating to Oracle
27 Database software.

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2 PeopleSoft software.

3 The location \\rsi-clsvr01\client_software\For Development Use Only has included materials
4 relating to Oracle Software and Support Materials. Oracle has had access to this location via VPN
5 for some time.

6 The address \\rsi-clsvr01\fileshare\software\Peoplesoft provides a link to \\rsi-
7 clsvr01\client_software\PeopleSoft, which may include Software and Support materials and
8 described above. Additionally, the address 10.12.1.5 is the IP Address for \\rsi-clsvr01, which may
9 include Software and Support materials as described above.

10 The testimony from the October 5, 2011 deposition of Krista Williams at 24:24-26:14, 27:7-
11 28:2, 28:14-30:6, 32:1-33:19, 36:5-39:21, 45:19-46:5, 54:3-54:25, 56:18-57:18, 58:13-59:18, 60:9-
12 62:5, 63:4-63:17, and 190:1-190:21.

13 Rimini further responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has
14 produced and/or will produce documents from which the answer to this Interrogatory can be
15 ascertained, including but not limited to the following:

16 Exhibit 3-1, which lists Bates-numbers for documents regarding the Oracle Specified
17 Locations. More specifically, the documents identified by Exhibit 3-1 indicate the contents of the
18 Oracle Specified Locations, as well as use of such information.

19 The documents spanning Bates-range RSI02971994-2158, which are Build Requests that
20 may indicate the sources for environment builds.

21 **INTERROGATORY NO. 25:**

22 For every copy of Software and Support Materials identified in your Response to
23 Interrogatory No. 24, describe each instance in which the copy of Software and Support Materials
24 was copied or used for a customer other than the specific customer, if any, from which or on whose
25 behalf You claim to have obtained the Software and Support Materials that was copied or used. If
26 you do not claim to have obtained a copy of Software and Support Materials indentified in your
27
28

1 Response to Interrogatory No. 24 from or on behalf of a specific customer, describe each instance in
2 which that copy of Software and Support Materials was copied or used.

3 **ORIGINAL ANSWER (July 11, 2011):**

4 Rimini Street objects to this Interrogatory as overly broad and unduly burdensome. Rimini
5 Street objects to this interrogatory to the extent it seeks information that is not within the possession,
6 custody, or control of Rimini Street. Rimini Street objects to the phrases “Non-Customer Location,”
7 and “used for a customer other than the specific customer” on the grounds and to the extent they are
8 vague and ambiguous. Rimini Street further objects to this interrogatory on the grounds that it
9 would require Rimini Street to create a compilation, abstract, or summary from documents that
10 Rimini Street has produced or will produce to Plaintiffs.

11 Subject to and without waiver of the foregoing general and specific objections, Rimini Street
12 responds as follows:

13 Rimini further responds that, pursuant to Federal Rule of Civil Procedure 33(d), Rimini has
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15 ascertained, including but not limited to the following:

16 Exhibit 3, which lists Bates-numbers for documents regarding the Oracle Specified
17 Locations. More specifically, the documents identified by Exhibit 3 indicate the contents of the
18 Oracle Specified Locations, as well as use of such information.

19 **FIRST SUPPLEMENTAL ANSWER (September 8, 2011):**

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21 Street objects to this interrogatory to the extent it seeks information that is not within the possession,
22 custody, or control of Rimini Street. Rimini Street objects to the phrases “Non-Customer Location,”
23 and “used for a customer other than the specific customer” on the grounds and to the extent they are
24 vague and ambiguous. Rimini will further provide an answer with respect to network and local
25 computer locations that, at any time, were intended for use, or were regularly used as, repositories of
26 Oracle Software and Support Materials that are not associated with a specific customer. Rimini
27 Street further objects to this interrogatory on the grounds that it would require Rimini Street to create
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22 **SECOND SUPPLEMENTAL ANSWER (November 22, 2011):**

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14 \\rsi-data01\share\software\PeopleSoft;

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18 include Software and Support materials as described above.

19 The testimony from the October 5, 2011 deposition of Krista Williams at 24:24-26:14, 27:7-
20 28:2, 28:14-30:6, 32:1-33:19, 36:5-39:21, 45:19-46:5, 54:3-54:25, 56:18-57:18, 58:13-59:18, 60:9-
21 62:5, 63:4-63:17, and 190:1-190:21.

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27 Oracle Specified Locations, as well as use of such information.

1 The documents spanning Bates-range RSI02971994-2158, which are Build Requests that
2 may indicate the sources for environment builds.

3
4
5 Dated: November 22, 2011

6 /s/ Robert H. Reckers

7 SHOOK, HARDY & BACON LLP

8 B. Trent Webb, Esq.

9 Eric Buresh, Esq.

10 2555 Grand Boulevard

11 Kansas City, Missouri 64108-2613

12 Telephone: (816) 474-6550

13 Facsimile: (816) 421-5547

14 bwebb@shb.com

15 eburesh@shb.com

16 Robert H. Reckers, Esq.

17 600 Travis Street, Suite 1600

18 Houston, Texas 77002

19 Telephone: (713) 227-8008

20 Facsimile: (731) 227-9508

21 rreckers@shb.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on the November 22, 2011 via email, as indicated below.

BOIES, SCHILLER & FLEXNER LLP
RICHARD J. POCKER (NV Bar No. 3568)
300 South Fourth Street, Suite 800
Las Vegas, NV 89101
Telephone: (702) 382-7300
Facsimile: (702) 382-2755
rpocker@bsfllp.com

BOIES, SCHILLER & FLEXNER LLP
STEVEN C. HOLTZMAN (*pro hac vice*)
FRED NORTON (*pro hac vice*)
KIERAN P. RINGGENBERG (*pro hac vice*)
1999 Harrison Street, Suite 900
Oakland, CA 94612
Telephone: (510) 874-1000
Facsimile: (510) 874-1460
sholtzman@bsfllp.com
fnorton@bsfllp.com
kringgenberg@bsfllp.com

BINGHAM MCCUTCHEN LLP
GEOFFREY M. HOWARD (*pro hac vice*)
THOMAS S. HIXSON (*pro hac vice*)
KRISTEN A. PALUMBO (*pro hac vice*)
Three Embarcadero Center
San Francisco, CA 94111-4067
Telephone: 415.393.2000
Facsimile: 415.393.2286
geoff.howard@bingham.com
thomas.hixson@bingham.com
kristen.palumbo@bingham.com

ORACLE CORPORATION
JAMES C. MAROULIS (*pro hac vice*)
500 Oracle Parkway
M/S 5op7
Redwood City, CA 94070
Telephone: 650.506.4846
Facsimile: 650.506.7114
jim.maroulis@oracle.com

By: /s/ Robert H. Reckers
Robert H. Reckers.